

1 **NYE, PEABODY, STIRLING, HALE
& MILLER, LLP**

2 Jonathan D. Miller (CA 220848)
3 Alison M. Bernal (CA 264629)
4 Jonathan@nps-law.com
5 33 West Mission St., Suite 201
6 Telephone: (805) 963-2345
7 Facsimile: (805) 563-5385

8 **CARLSON LYNCH SWEET
KILPELA & CARPENTER, LLP**

9 Todd D. Carpenter (CA 234464)
10 tcarpenter@carlsonlynch.com
11 1350 Columbia Street, Ste. 603
12 Telephone: (619) 762-1900
13 Facsimile: (619) 756-6991

14 *Attorneys for Plaintiffs and the Class*
15 [Additional Counsel Listed on Signature Page]

16 **UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

17 MEGAN SCHMITT, DEANA
18 REILLY, CAROL ORLOWSKY, and
19 STEPHANIE MILLER BRUN,
20 individually and on behalf of
21 themselves and all others similarly
22 situated,

23 Plaintiffs,

24 v.

25 YOUNIQUE, LLC,

26 Defendant.

27 Case No. 8:17-cv-01397-JVS-JDE

28 **DECLARATION OF ADAM
GONNELLI IN SUPPORT OF
PLAINTIFFS' AMENDED EX PARTE
APPLICATION TO STAY THE CASE
AND MOTION FOR DISCOVERY
SANCTIONS**

Complaint Filed: 8/17/17

Trial Date: 2/19/19

29 **DECLARATION OF ADAM GONNELLI**

30 I, Adam Gonnelli, declare as follows:

31 1. I am a partner of the Sultz Law Group, P.C., counsel for Plaintiffs
32 Megan Schmitt, Deana Reilly, Carol Orlowsky, and Stephanie Miller Brun.

33 DECLARATION OF ADAM GONNELLI IN SUPPORT OF PLAINTIFFS' AMENDED EX PARTE
34 APPLICATION TO STAY THE CASE AND MOTION FOR DISCOVERY SANCTIONS

2. I make this declaration in support of Plaintiffs' Amended *Ex Parte* Application to Stay the Case and Motion for Discovery Sanctions.

3. Attached hereto as **Exhibit 1** is a true and accurate copy of Plaintiffs' June 4, 2018 Notice of 30(b)(6) Deposition.

4. Attached hereto as **Exhibit 2** is a true and accurate copy of Defendant's July 13, 2018 Objections to Plaintiff's Notice of 30(b)(6) Deposition.

5. Attached hereto as **Exhibit 3** is a true and accurate copy of a Rough Draft of the July 27, 2018 Transcript of Robert Philips.

6. Attached hereto as **Exhibit 4** is a true and accurate copy of Rough Draft of the July 27, 2018 Transcript of Vrena Ranallo.

7. On July 26, 2018, the day before Defendant's 30(b)(6) depositions were held, Defendant identified the designated witnesses for the topics listed in Plaintiff's Notice of 30(b)(6) Deposition: Robert Phillips for topics 1, 5, and 6, and Vrena Ranallo for topics 2, 3, 4, and 7.

8. During the July 27, 2018 deposition of Vrena Ranallo, I notified Defendant's counsel that Defendant's designated 30(b)(6) witness was not adequate and suspended the deposition. *See Exhibit 4*, annexed hereto at 57:9-12.

Dated:

Red Bank, New Jersey
August 9, 2018

THE SULTZER LAW GROUP P.C.

By: /s/
Adam Gonnelli, Esq.
280 Highway 35, Suite 304
Red Bank, NJ 07701
Tel: (845) 705-9462
Fax: (888) 749-7747
gonnellia@thesultzerlawgroup.com